

# EXHIBIT E

**In The Matter Of:**  
*TAMARA DOWNEN, ET AL. v.*  
*MONTANA VETERANS' HOME, ET AL.*

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*DEPOSITION OF OFFICER MIKE JOHNSON*  
*November 25, 2013*

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1 put 20 to 30 hours a week as a reserve. So probably that  
2 would be part time, I guess. But it was not paid, so it  
3 was voluntary at that time.

4 Q Of that 20 to 30 hours per week, how much of  
5 that time was training time?

6 A You're always -- you're always learning. Every  
7 day you learn something new, so pretty much every time I'm  
8 there, there's always something you're learning, driving  
9 techniques or dealing with people or whatever.

10 Q Sure. In terms of that field training, did you  
11 receive any taser training with Columbia Falls?

12 A Not at that time. I'd already received it  
13 through the sheriff's department.

14 Q Okay. And I believe you said that that training  
15 took place in 2006?

16 A I think.

17 Q That's okay.

18 A I'd have to look at my certificate. I think  
19 that's about when it was. That's when taser really  
20 started coming around the valley.

21 Q How long was that training?

22 A I don't even remember. Maybe half a day.

23 Q Okay. Who gave you that training?

24 A Travis Bruyer.

25 Q And who is Travis Bruyer?

1 A He's a deputy with Flathead County.

2 Q Who else --

3 A Actually, then he was a jailer. I don't know if  
4 he had worked for the sheriff's office then. I think he  
5 was still a jailer then.

6 Q Who else took that course with you?

7 A I couldn't even remember the people that were in  
8 there.

9 Q Roughly how many people were in there?

10 A Ten, maybe 15.

11 Q Did you receive a certification at the end of  
12 that training?

13 A I did.

14 Q Do you know if Travis Bruyer was taser certified  
15 as an instructor?

16 A He was.

17 Q Officer Johnson, we recently received a video  
18 that appears to depict you being tased.

19 A Yes, sir.

20 Q Have you seen that video before?

21 A Yes, sir.

22 Q Do you know if that video was taken at this 2006  
23 taser training?

24 A No, it was not.

25 Q If you could tell me when that video was taken,

1 that would be helpful.

2 A Whenever we had our last taser training. I  
3 can't even tell you when it was. A year ago maybe. I  
4 can't even remember when it was.

5 Q Was this a taser training that happened in  
6 Columbia Falls?

7 A Yes, sir.

8 Q How long did that taser training last?

9 A A few hours. It was a refresher course. All of  
10 us that were there had already been certified once before.

11 Q Okay. Do you maintain your taser certification?

12 A In Montana you don't have to.

13 Q Okay. Have you ever been -- have you received a  
14 certification from TASER International?

15 A The certificate -- the second class I don't know  
16 if we ever got our certificates, but the one for the posse  
17 I did.

18 Q Okay. 2006 you received a certificate?

19 A I believe that's when it was. I'd have to look  
20 at the certificate. I'm not sure exactly, but I'm pretty  
21 sure it was 2006.

22 Q Okay. But after 2006 you're not sure if you  
23 ever received a taser certification?

24 A I know the last time we did it we never got  
25 certificates for it.

1 9:20.

2 (Brief Recess taken, after which Ms. Downen was present.)

3 THE VIDEOGRAPHER: Back on the record. The time  
4 is 9:20.

5 Q (BY MR. DUERK) Officer Johnson, back on the  
6 record now. Just remind you you're still under oath.  
7 Okay?

8 A Yes, sir.

9 Q So we were talking about the Montana Law  
10 Enforcement Academy and any duties that you had as a  
11 patrol officer between your hire date and receiving your  
12 certificate. What kinds of responsibilities and duties  
13 did you have during that time frame?

14 A When I was at the academy?

15 Q No.. I'm sorry. Between the time that you were  
16 hired and going to the academy.

17 A Oh, just same duties as I have now, for the most  
18 part, patrol.

19 Q What gear were you issued as a patrol officer  
20 when you were hired?

21 A My taser. The rest of the gear was mine. I  
22 already -- I had all my handgun and all the other stuff.  
23 Pepper spray, I guess, we did get issued pepper spray.

24 Q Okay. New uniform.

25 A Yeah, all that I already had previous to my

1 volunteer for it?

2 A Yes.

3 Q Okay. And was being tased a requirement of that  
4 training?

5 A No.

6 Q All right. And did everyone at that training  
7 get tased?

8 A No.

9 Q Was that the first time you'd ever been tased?

10 A No.

11 Q Can you describe any other time in which you've  
12 been tased?

13 A At our first training, there's a group of us  
14 that got in like hooked arms or whatever, and one lead was  
15 on one end and one lead was on the other end and --

16 THE COURT REPORTER: I'm sorry, I didn't hear  
17 that.

18 THE DEPONENT: We all got shocked --

19 THE COURT REPORTER: Thank you.

20 THE DEPONENT: -- at the same time.

21 Q (BY MR. DUERK) Prior to being tased at any of  
22 those trainings, were you asked questions about your  
23 health status?

24 A Yes.

25 Q Okay.

1 A Yes.

2 Q And what kinds of questions were you asked?

3 A Asked if we were in good health or if we were  
4 okay for it. They asked me if I was okay, if it was going  
5 to hurt my back, because I had broke my back a few years  
6 before the last tasing, so.

7 Q Okay. Was there anyone with any type of  
8 healthcare training on scene when you were tased in those  
9 training conditions?

10 A Officer Stanberry used to be a paramedic when he  
11 lived in Missouri.

12 Q Was there a first aid kit, defibrillator, or any  
13 other type --

14 A We were in the fire hall, so whatever they had  
15 we had access to.

16 Q Were there other fire-hall employees on scene  
17 there?

18 A No.

19 Q Okay. Was there any sort of mat or padding  
20 under you when you were tased?

21 A Yes, and that's what the officers are there  
22 to -- to hold you up as well so you don't --

23 Q Could you describe that mat, to the best of your  
24 recollection?

25 A It's like a solid rubber mat, kind of like what



1 they have in gyms.

2 Q You were lowered to the ground by two officers,  
3 one on either side of you?

4 A Yes.

5 Q Okay. And that was true -- or was that true  
6 every time you've been tased in the past?

7 A The first time we were on like -- kneeled down  
8 in a group, so you just kind of hunched over.

9 Q Okay. Officer, just some basic questions about  
10 your body size. How much do you weigh?

11 A I think I -- at our health screening, I think I  
12 was 235.

13 Q At the time of the incident with Stanley Downen,  
14 did you weigh about 235?

15 A Probably about 230 then, because I had just got  
16 out of the hospital not too long before that, so I was a  
17 little skinnier.

18 Q Okay. And how tall are you?

19 A I was 6-1. I'm 6 foot like and a half now. I  
20 lost half an inch, I guess.

21 Q I understand you had some sort of back injury?

22 A Yeah.

23 Q All right. If you could tell me a bit about  
24 that, please.

25 A I was out riding my four-wheeler, and I jumped

1 he was. I didn't know.

2 Q If you could recall for me the first knowledge  
3 you had that there was a call involving Stanley Downen at  
4 the VA home, that would be helpful.

5 A I didn't know Stanley was the one at the VA  
6 home. We just got a call of a male --

7 Q And what were you aware of in terms of that  
8 call? How did that play out?

9 A Like I said, we were changing, I just heard  
10 something about there was something going on at the vets'  
11 home with a -- I'm not sure what term they used, something  
12 about something going on there. So I asked  
13 Officer Stanberry if he wanted me to go with him, and he  
14 said sure, so I jumped in with him, and we headed out  
15 there.

16 Q Okay. And at that time what was your  
17 understanding of the nature of the call?

18 A I just figured they had a disorderly person  
19 or -- I wasn't sure exactly what was going on.

20 Q Okay. Do you recall anything specific that came  
21 in through dispatch about the nature of the call?

22 A No.

23 Q Okay. Do you recall anything about the --

24 A The only thing I remember is they said he was  
25 coming up the road. That's about it.

1           Q     Okay. All right. Anything else that you  
2 learned at that time about the nature of the call, that  
3 you remember?

4           A     Not really.

5           Q     Okay.

6           A     I was trying to watch for traffic and stuff as  
7 we responded to it.

8           Q     Do you recall anything coming in over the radio  
9 during your ride to the VA home?

10          A     No, I don't.

11          Q     Do you remember any conversation with  
12 Officer Stanberry during that ride to the VA home?

13          A     No.

14          Q     Okay. Do you remember any other information  
15 about the nature of the call that came in that we haven't  
16 discussed during that ride to the VA home?

17          A     Not that I can recall, just that they had a male  
18 that was coming up the road. And that was about it.

19          Q     Okay.

20          A     I think they might have said that they weren't  
21 able to contain him or something like that.

22          Q     Okay. What's the first thing that you remember  
23 when you arrived at the VA home? Let's talk about how you  
24 arrived at the VA home. You were in a police car,  
25 correct?

1 A Yes.

2 Q All right. And can you describe for me that  
3 situation where the police car pulled into the VA home?

4 A Officer Stanberry was driving, so you'll have to  
5 ask him how he pulled in, but --

6 Q Okay.

7 A I was just a passenger.

8 Q That's okay. Were you in uniform at the time?

9 A Yes.

10 Q Okay. Were you carrying a gun?

11 A Yes.

12 Q Were you carrying a taser?

13 A Yes.

14 Q And you were still wearing your badge?

15 A Yes.

16 Q All right. Do you recall roughly what time you  
17 pulled in?

18 A It had to be pretty close to 5:00, because I was  
19 just getting ready to leave. So it had to be really near  
20 5:00, just a little before, just a little after.

21 Q How far onto the VA home's property did you pull  
22 into, to the best of your recollection?

23 A Maybe -- I don't know, a few hundred yards  
24 maybe.

25 Q Okay. And what did you see as you were pulling

1 into the VA home?

2 A A male walking down the road with a group of --  
3 I believe they were nurses and stuff that were near him.

4 Q And if you can describe how far those nurses  
5 were from Mr. Downen, that would be helpful.

6 A They were probably a pretty good ways -- they  
7 weren't like a mile away from him. They were probably, I  
8 don't know, the distance of this room away from him.

9 Q And if -- I'll just say that this room --

10 A 20.

11 Q -- appears to be about --

12 A 20 yards maybe.

13 Q 20 yards?

14 A 15, 20 yards.

15 Q In terms of the position of those nurses in  
16 relation to Mr. Downen, were they approximately 20 yards  
17 behind him, or where were they?

18 A They were kind of in -- kind of like a horseshoe  
19 sort of --

20 Q Okay.

21 A -- around him.

22 Q My understanding is that you pulled into the  
23 nursing home and parked the vehicle, correct?

24 A I wasn't driving.

25 Q You didn't drive, but the vehicle was parked?

1 Q All right. What happened after you got out of  
2 the car?

3 A We got out of the car, and we came around the  
4 car, and the first thing I remember one of the staff  
5 members asked us if we had shields, because Stanley was  
6 armed with some big rocks.

7 Q Okay.

8 A We're like, No.

9 Q Which member of the nursing-home staff said  
10 that?

11 A I don't know.

12 Q Was it a man or a woman?

13 A I think it was a female. I think it was  
14 a woman.

15 Q How soon after you got out of the car did you  
16 hear this from her?

17 A Probably like before we even got to the front of  
18 our patrol cars.

19 Q Okay. Anything else that any nursing-home staff  
20 told you?

21 A No, not that I can recall.

22 Q Okay. Did you respond to this nursing-home  
23 staff asking if you had shields?

24 A We said no.

25 Q Okay. Anything else that nursing-home staff

1           A     He kind of walked over towards the baseball  
2 field, and then he turned around and came back out towards  
3 the cruisers, the patrol car.

4           Q     At any time did he leave the pavement of that  
5 entry drive?

6           A     Yes, for just a moment he did.

7           Q     What side of the entry drive was he on when he  
8 left the pavement?

9           A     What way are we looking?

10          Q     We are looking at the veterans' home --

11          A     The entrance?

12          Q     -- from the entry drive.

13          A     He would have been to the right to where the  
14 baseball fields are.

15          Q     Okay. And how far off of the drive did he go?

16          A     A few steps, four or five steps maybe.

17          Q     Did he seem to be confused to you at that time?

18          A     I don't think he was confused. I think he  
19 wanted to get away from everybody.

20          Q     Okay.

21          A     Because he told us earlier, like I said, he  
22 wanted to leave, he didn't --

23          Q     If you can recall for me anything specific that  
24 you remember Mr. Downen saying, that would be helpful.

25          A     I told you, he told us that to F off, and he

1 told us that he wanted to leave and leave him alone.

2 Q Okay. Can you recall anything else that any of  
3 the nursing home said to you?

4 A No. I really didn't -- really wasn't focusing  
5 on them anymore.

6 Q Okay. And can you recall anything that  
7 Mr. Downen said to Officer Stanberry?

8 A You'd have to ask Officer Stanberry.

9 Q Okay. Can you recall anything that  
10 Officer Stanberry said to anyone else at the scene?

11 A Not really.

12 Q Okay.

13 A At that point, no.

14 Q How long of a period of time was there between  
15 you exiting the police car and tasing Mr. Downen?

16 A Maybe five minutes.

17 Q And have we discussed everything that happened  
18 during that period of time?

19 A No.

20 Q Okay. What else happened?

21 A I asked Mr. Downen to drop the rocks a couple  
22 times.

23 Q Okay. If you can describe for me those rocks,  
24 that would be helpful.

25 A He had two rocks in one hand, and then he had



1 really big -- a pretty good-sized rock in the other hand.

2 It was a big rock.

3 Q Okay. And how was he carrying those rocks when  
4 you saw him?

5 A He had them at his side.

6 Q Okay. And what was he doing with those rocks?

7 A He was just -- he just had them in his hands.

8 Q Okay. Anything else that occurred that we  
9 haven't discussed prior to Mr. Downen being tased?

10 A Yes.

11 Q Okay. What else?

12 A Just before Mr. Downen was tased, he raised his  
13 arm to throw the rock right at me.

14 Q Okay. All right. Officer, you're left-handed;  
15 is that correct?

16 A No.

17 Q You're right-handed?

18 A Yes.

19 Q Which arm did Mr. Downen raise?

20 A I believe it was his left arm.

21 Q His left arm, okay. And if you could describe  
22 the size of that rock for me.

23 A It was pretty big (indicating).

24 Q Okay. Did you take that rock into evidence  
25 afterwards?

1           A     We did take photos of it, yes.

2           Q     Okay. Do you still have the rock today?

3           A     No.

4           Q     Can you estimate for me how much that rock  
5 weighs or weighed?

6           A     It probably weighed a couple pounds, I bet. It  
7 was a pretty big-sized rock.

8           Q     In terms of the size, can you estimate the size  
9 for me?

10          A     Bigger than a softball.

11          Q     Okay. At what point did Mr. Downen raise that  
12 rock?

13          A     As we were standing there, he just went to throw  
14 it at me, and that's when I deployed my taser.

15          Q     Okay. Prior to deploying your taser -- prior to  
16 firing the taser, where was the taser?

17          A     In my hand.

18          Q     At what point did you draw your taser?

19          A     As soon as I saw that Mr. Downen was armed with  
20 rocks.

21          Q     When did you first see that Mr. Downen had a  
22 rock?

23          A     As soon as we come around the car and they said  
24 that, I looked over there, and I could see he had some big  
25 rocks in his hand.

1 Q Okay. Did you say anything to Mr. Downen about  
2 your taser?

3 A I told him that he was going to be tased if he  
4 didn't drop the rocks.

5 Q At what point did you say that to him?

6 A I told him to drop the rocks or he was going to  
7 be tased.

8 Q Okay. And how long after you exited the police  
9 car did you say that to Mr. Downen?

10 A It was a few minutes. I tried to talk to him to  
11 calm him down first.

12 Q Okay. What kinds of things did you say to  
13 Mr. Downen in an attempt to calm him down?

14 A I told him who I was, I asked him what was going  
15 on, I asked him if I could help him, if there was anything  
16 I could do for him.

17 Q Anything else that you recall saying?

18 A No.

19 Q In response to what you were saying to  
20 Mr. Downen, what did he say to you?

21 A "Fuck you."

22 Q Anything else?

23 A Not that I can remember.

24 Q Okay. Where was Mr. Downen when he raised the  
25 rock?

1           A     Okay.

2           Q     Okay. So, Officer, we were talking about the  
3 equipment that you had on your belt or on your person  
4 during the Stanley Downen incident. Can you recall for me  
5 what gear you had that day?

6           A     I had my handgun, two handcuffs, my taser, my  
7 radio, my keys.

8           Q     Pepper spray?

9           A     No.

10          Q     Were you carrying any sort of baton or stick?

11          A     No..

12          Q     Okay. Any concealed weapon, boot weapon?

13          A     I would have a pocket knife.

14          Q     Okay. What type of pocket knife?

15          A     It's pretty much the same one I always carry.  
16 It's a little Kershaw, the same one I always carry  
17 (indicating).

18          Q     Any other gear or equipment that you were  
19 carrying on your person that day?

20          A     No.

21          Q     I'm sorry, and you may have said this already,  
22 Officer, but did you have a radio on your person?

23          A     I did say radio, yes.

24          Q     Great. Then in the vehicle, what other  
25 equipment did you have access to in the vehicle?

1 A 12-gauge shotgun and an AR-15.

2 Q Okay.

3 A Lethal force.

4 Q Okay. If you could estimate for me, to the best  
5 of your recollection, Stanley Downen's height when you  
6 responded to this call, that would be helpful.

7 A He's shorter than me. He's probably -- I would  
8 guess like 5-6, 5-8, somewhere around there. I don't --  
9 around there somewhere.

10 Q That's okay. And if you could estimate for me  
11 his weight based on what you remember.

12 A Maybe 140, 150. I don't know.

13 Q Okay. Did you hear Stanley Downen hit the  
14 pavement?

15 A No.

16 Q Okay. Did you hear anything at all when he hit  
17 the pavement?

18 A No.

19 Q Okay. How long did you cycle your taser?

20 A It cycles for five seconds automatically.

21 Q Okay. And did you cycle it more than the one  
22 time?

23 A No.

24 Q All right. Describe for me what happened after  
25 Mr. Downen hit the pavement.

1 Q Okay.

2 A You kind of just like uh-hh.

3 Q Did Mr. Downen say anything else to you after he  
4 was tased?

5 A When he was on the ground handcuffed, yes.

6 Q Okay. And what do you recall Mr. Downen saying?

7 A He was yelling at us, telling to let him go. I  
8 don't know. I've got -- I know I turned my -- I think I  
9 turned my lapel cam on at that time. I had forgotten to  
10 turn it when I -- because I was getting ready to go home,  
11 otherwise I would have turned it on sooner. I wish I  
12 would have, but . . .

13 Q Okay.

14 A He was yelling at us, cussing, using profanity  
15 again.

16 Q Was he moaning or crying at all?

17 A He wasn't crying. He wasn't moaning -- yeah, he  
18 did moan a little bit.

19 Q Okay. How long did the moaning last?

20 A I don't know. You could watch the video and  
21 tape it and time it. I don't know.

22 Q Okay. The lapel video, how often do you use the  
23 lapel video when you're patrolling?

24 A If I remember to turn it on?

25 Q Uh-huh.

1           A     Probably not a lot. I always forget to turn it  
2 on.

3           Q     Okay.

4           A     We had just gotten them too at that point; they  
5 were pretty new.

6           Q     How long before the Downen incident had you  
7 received those lapel videos?

8           A     Not too long. We had only had them for a very  
9 short time when this happened.

10          Q     Days? Weeks?

11          A     Maybe a month maybe, two months. It was pretty  
12 new.

13          Q     What is the protocol for using your lapel video?

14          A     There's no protocol.

15          Q     Any policies?

16          A     No.

17          Q     No procedures? Nothing like that?

18          A     No.

19          Q     Okay.

20          A     It's more for our record or for our safety.

21          Q     Okay. Do you have any cameras in any of your  
22 police cruisers?

23          A     Most of them do have a camera in there.

24          Q     What's the procedure for using those cameras?

25          A     Our new ones or our old -- in our older cars, we

1           Q     At what point were the taser probes removed from  
2 Mr. Downen?

3           A     I think it was when the medical staff got there.

4           Q     And how long after the tasing did the medical  
5 staff arrive?

6           A     I don't know, a few minutes usually.

7           Q     Okay. Do you know who removed those taser  
8 darts?

9           A     No, I don't.

10          Q     Where were those taser darts located on  
11 Mr. Downen's body?

12          A     I think one was in his -- the back of his arm,  
13 and I think the other one was near his buttocks, I  
14 believe.

15          Q     Okay. Between the point of your arrival and the  
16 deployment of the taser darts, did you hear anything that  
17 we haven't covered from the nursing staff?

18          A     No. I didn't really pay attention to what the  
19 nurse staff had to say.

20          Q     Did you have any conversations with the nursing  
21 staff after Mr. Downen was tased?

22          A     Yes.

23          Q     Okay. What do you recall of those  
24 conversations?

25          A     They kind of gave us a scenario of what



1 time this occurred?

2 A I don't -- I don't know if I gave any statements  
3 out there or if Officer Stanberry brang some back later.  
4 I'm sure that's probably more what happened --

5 Q Okay.

6 A -- because we had a lot of other stuff going on,  
7 so, and I was supposed to be off work too, so --

8 Q Right.

9 A -- I assume Officer Stanberry probably brought  
10 them back later. You'll have to ask him.

11 Q What's the purpose of those statement forms?

12 A Just like a written statement of what happened,  
13 gives the people a chance that were there to fill out a  
14 written statement to -- if they wish. It's voluntary. It  
15 sates it's a voluntary statement, so.

16 Q Aside from the nurses on the scene and  
17 Mr. Downen and you and Officer Stanberry, were there any  
18 other witnesses at the scene?

19 A I would assume so.

20 Q Did you see any?

21 A I saw some people over at the baseball field.  
22 It's baseball season, so there was a lot of people over  
23 there too, so.

24 Q Did you hear anything that the people over by  
25 the baseball field were saying?

1 Q How often would you inspect the taser unit that  
2 you used in this case?

3 A How do you mean inspect it?

4 Q Is there any protocol for how often you inspect  
5 the taser unit?

6 A I usually take it out every day, and I'll do a  
7 dry -- I'll take the taser cartridge off, and I'll do a --  
8 and just cycle -- cycle the taser like a few times a week.

9 Q Okay. And how long is the cycle?

10 A It's five seconds.

11 Q How much voltage is used in a taser charge?

12 A It's 30,000 volts.

13 Q Okay. And were 30,000 volts administered to  
14 Stanley Downen?

15 A If that taser did what it was supposed to.

16 Q Okay. And did it cycle for the full five  
17 seconds?

18 A It did.

19 Q Okay. And I think you testified about this  
20 already, but you just used one cycle?

21 A Yes, sir.

22 Q Okay. The rocks, I believe we've received some  
23 photographs of those rocks, true?

24 A Yes, I believe you have.

25 Q Okay. Were the rocks themselves taken into

1 A No, it's not.

2 Q It's property of the Columbia Falls Police  
3 Department?

4 A Yes, it is.

5 Q All right. When you received that taser unit,  
6 were you given any written material prior to being issued  
7 that taser?

8 A No. We just sign some paperwork for the chief  
9 that that serial number matches the taser we were issued.

10 Q Okay. Were you asked to review the taser policy  
11 before you were issued the taser?

12 A No.

13 Q Have you ever reviewed the taser policy with the  
14 Columbia Falls Police Department?

15 A When we did a review a few years ago or a year  
16 ago, yes.

17 Q And today's date, November 25, 2013, when was  
18 the year-ago review, to the best of your knowledge?

19 A I'm not sure, sir. I can't -- whenever our  
20 taser training was is when we would have looked at that  
21 stuff.

22 Q Okay. But just on the math alone, that taser  
23 review would have happened sometime in 2013, correct?

24 A Yes.

25 Q All right. So after Stanley Downen's incident?

1           A     I believe it was. When was the Stanley Downen  
2 thing exactly?

3           Q     I believe the records will show it was June of  
4 2012.

5           A     Okay.

6           Q     Okay.

7           A     So I think it was after that.

8           Q     All right. And prior to the Stanley Downen  
9 incident, can you recall ever having reviewed the taser  
10 policy from the Columbia Falls Police Department?

11          A     No.

12          Q     Okay. And prior to the Stanley Downen incident,  
13 can you recall ever reading any warning materials about  
14 taser units?

15          A     Only what was -- what would have been given to  
16 us in our classes. And that would have been back in 2006.

17          Q     All right. Prior to the Stanley Downen  
18 incident, did Chief Perry or any other supervisor or  
19 trainer at the Columbia Falls Police Department ask you to  
20 look at any warning materials related to the taser X26  
21 unit?

22          A     No.

23          Q     Are you aware of any warning materials published  
24 by TASER International that advised that tasers have  
25 special precautions with the elderly or infirm or

1 individuals who are at risk of falls?

2 A No.

3 MS. PRINZING JONES: Objection, vague and  
4 compound.

5 MR. DUERK: I'll clean that up.

6 Q (BY MR. DUERK) Have you read any warnings about  
7 the taser unit with respect to their use on the elderly,  
8 the infirm, or individuals who are a fall risk?

9 MS. PRINZING JONES: Same objection.

10 MR. DUERK: I'll break it down further.

11 Q (BY MR. DUERK) Have you read any warnings about  
12 use of the taser unit on the elderly?

13 A No.

14 Q Have you read any warnings about use of the  
15 taser unit on anyone who is infirm or ill?

16 A No.

17 Q Have you read any warnings related to the taser  
18 unit on their use with anyone who is at risk of falls?

19 A No.

20 Q You've seen no such type warning materials at  
21 any time before today's date?

22 A Not related to that, no.

23 Q Okay. What warnings, if any, have you seen  
24 related to the use of the taser?

25 A I read an article about excited delirium. That